

Remarks

This communication is responsive to the Final Office Action of June 14, 2005.
Reexamination and reconsideration of **claims 1-22** is respectfully requested.

Summary of The Office Action

Claim 4 stands allowed.

Claims 6 and 20 were indicated to be allowable if rewritten in independent form.

Claims 1-3, 5, 7-19, and 21-22 stand rejected under 35 U.S.C. § 103(a) as being anticipated by Miyamoto et al. (U.S. Pat. No. 4,591,884), in view of what is well known in the prior art.

The Present Claims Patentably Distinguish Over the References of Record

Independent Claim 1

The Office Action states on page 2 that Miyamoto purportedly teaches a first accessory device with a reversing paper path (444 in Fig. 16) to reverse the order of the printed pages as recited in claim 1. The Office Action cites column 15, lines 30-49 of Miyamoto.

Miyamoto fails to teach or suggest the claimed feature because Miyamoto reverses paper for two-sided recording and does not teach or suggest a reversing paper path to reverse the order of printed pages. Applicant respectfully points out that reversing the order of printed pages is a different feature and a different functionality than flipping a page for two-sided printing. The Examiner's attention is directed to Miyamoto in column 15, lines 41-42 where it describes that the paper "...is reversed in the first paper handling portion 420 and an image is formed on a second surface of the paper..."

Therefore, when Miyamoto discusses "reversing," it means flipping a piece of paper for two-sided recording. All references to "reversing" in Miyamoto discuss it as flipping a piece of

directed to the same problem. As such, Miyamoto fails to teach or suggest all the features of claim 1 and claim 1 patentably distinguishes over Miyamoto.

Additionally, the Office Action states that claim 1 is obvious over Miyamoto in view of what is well known in the prior art. In particular, the Office Action states that it would be a design choice and well known in the art to make the paper handling portion 420 of Miyamoto externally coupled to the printer. However, as stated previously, the paper handling portion 420 is not the claimed accessory device recited in claim 1. Therefore, Miyamoto fails to teach or suggest the claimed accessory device and thus using what is purportedly well known in the art fails to cure this shortcoming.

Applicant respectfully submits that an analysis of 35 USC §103 requires that evidence of a suggestion, teaching, or motivation to modify must be shown. In the present case, there is no evidence that teaches or suggests why the claimed device as recited in claim 1 would be made to externally couple a printer and be configured to receive printed pages from the printer.

Since claim 1 recites features not taught or suggested by Miyamoto, alone or in combination with other references, claim 1 patentably distinguishes over the references. Accordingly, dependent claims 2, 3, and 5-12 also patentably distinguish over the references and are in condition for allowance.

Independent Claim 13

Independent claim 13 recites a reversing paper path to reverse the order of the printed pages received from the previous device. As previously explained, Miyamoto teaches a paper path that reverses or flips a piece of paper for two-sided recording. This is very different from a paper path that reverses the order of printed pages. As such, modifying Miyamoto with what is purportedly known in the art fails to cure the shortcomings of Miyamoto.

Since claim 13 recites features not taught or suggested by Miyamoto, alone or in combination with other references, claim 13 patentably distinguishes over Miyamoto.

Accordingly, dependent claims 14-17 also patentably distinguish over the references and are in condition for allowance.

Additionally, dependent claim 17 recites that the accessory device is configured to be coupled externally to a printing device and be configured as part of a chain of accessory devices that can be coupled together. Miyamoto fails to teach or suggest any such accessory since the printer components are internal to the printer and the components do not teach or suggest the claimed accessory device. For this addition reason, claim 17 patentably distinguishes over Miyamoto.

Independent Claim 18

Claim 18 recites outputting the plurality of printed pages, in reverse order, from the printing device to a first accessory device and processing the received printed pages...where the first accessory device has a...reversing paper path to reverse the order of the printed pages.

As shown previously, paper handling portion 420 of Miyamoto does not reverse the order of printed pages. Therefore, Miyamoto fails to teach or suggest outputting printed pages in reverse order and a reversing paper path to reverse the order of the printed pages as recited in claim 18.


Therefore, Miyamoto, alone or in combination with other references, fails to teach or suggest the claimed features of claim 18 and claim 18 patentably distinguishes over Miyamoto. Accordingly, dependent claims 19-22 also patentably distinguish over the references and are in condition for allowance.

Conclusion

For the reasons set forth above, **claims 1-22** patentably and unobviously distinguish over the references of record and are now in condition for allowance. An early allowance of all claims is earnestly solicited.

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Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Petar Kraguljac", is written over a horizontal line.

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